

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Federal-State Joint Board on	)	CC Docket No. 96-45
Universal Service	)	
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337
Reform	)	

**REPLY COMMENTS OF  
GOLDEN WEST TELECOMMUNICATIONS COOPERATIVE, INC.**

Golden West Telecommunications Cooperative, Inc. ("Golden West") submits these reply comments in response to the Federal Communications Commission's ("FCC") three notices of proposed rulemaking released January 29, 2008 seeking comment on proposals for comprehensive reform of the federal universal service mechanisms for rural and high-cost areas.<sup>1</sup> In particular, the purpose of these reply comments is to respond to specific allegations set forth in the Comments filed by CTIA-The Wireless Association in this proceeding on April 17, 2008 (the "CTIA Comments").

In the CTIA Comments at page 10, CTIA states:

".....wireless ETCs have used universal service dollars to bring service to customers in rural and insular areas that previously lacked service. For example, on the Pine Ridge Indian Reservation in South Dakota, Alltel has used universal service to increase telephone penetration rates from 27 percent to 92 percent in only five years. Alltel has also used universal service support to extend service in

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<sup>1</sup> *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337; *CC Docket No. 96-45, Notice of Proposed Rulemaking*, FCC 08-22 (rel. January 29, 2008) ("*RD NPRM*"); *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337; *CC Docket No. 96-45, Notice of Proposed Rulemaking*, FCC 08-5 (rel. January 29, 2008) ("*2008 Auctions NPRM*"); *High-Cost Universal Service Support; Federal-State Joint Board on Universal Service*, WC Docket No. 05-337; *CC Docket No. 96-45, Notice of Proposed Rulemaking*, FCC 08-4 (rel. January 29, 2008) ("*ISR NPRM*").

other Indian reservations, increasing penetration on the Rosebud Indian Reservation in South Dakota from about 40 percent in 2004 to 100 percent today...

The statistics set forth by CTIA regarding penetration rates by Alltel on the Pine Ridge Indian Reservation and the Rosebud Indian Reservation in South Dakota are simply not correct. The following two recent government reports provide a distinctly different analysis of the availability of telecommunications service on the Pine Ridge Reservation and the Rosebud Indian Reservation: *Telephone Subscribership on American Indian Reservations and Off-Reservation Trust Lands*<sup>2</sup> released by the FCC in May 2003, and *Telecommunications Challenges to Assessing and Improving Telecommunications for Native Americans on Tribal Lands* released by the United States Government Accountability Office, GAO 06-189<sup>3</sup>, January 2006.

These Reports, both based on the 2000 Census data, provide an unbiased analysis of wireline penetration rates on American Indian Reservations and Off-Reservation Trust Lands. As stated in each Report, wireline penetration rates on the Pine Ridge Reservation were already greater than 75% for American Indian housing units by 2000.<sup>4</sup> The Reports further state that telephone subscribership rates on the Rosebud Indian Reservation were already approximately 70% for American Indian housing units by 2000.<sup>5</sup> It should be noted that Alltel f/k/a Western Wireless Corporation ("Alltel") received certification as an eligible telecommunications carrier

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<sup>2</sup> View report at [http://www.fcc.gov/Bureaus/Common\\_Carrier/Reports/FCC-State\\_Link/IAD/subsai03.pdf](http://www.fcc.gov/Bureaus/Common_Carrier/Reports/FCC-State_Link/IAD/subsai03.pdf)

<sup>3</sup> View report at <http://www.gao.gov/new.items/d06189.pdf>

<sup>4</sup> *Telephone Subscribership on American Indian Reservations and Off-Reservation Trust Lands* released by the Federal Communications Commission on May 5, 2003 at Table 3. *Telecommunications Challenges to Assessing and Improving Telecommunications for Native Americans on Tribal Lands* released by the United States Government Accountability Office in January 2006 p. 14, Figure 3.

<sup>5</sup> *Ibid.*

on the Pine Ridge Indian Reservation in October 2001,<sup>6</sup> after the above census data was collected. Additionally, Alltel received certification as an eligible telecommunications carrier for the area serving much of the Rosebud Indian Reservation in January 2005.<sup>7</sup>

Given these facts, it is evident that Alltel or CTIA's claims that telephone penetration rates on the Pine Ridge Reservation improved from less than 30% to more than 90%, and that the telephone penetration rates on the Rosebud Indian Reservation rose from 40% to 100% subsequent to Alltel's designation as a competitive eligible telecommunications carrier are clearly inaccurate. It is not credible for Alltel to claim that a material increase in the telephone penetration rates on the Pine Ridge Reservation or the Rosebud Indian Reservation is attributable to Alltel's receipt of Federal Universal Service support in light of the FCC's and GAO's documentation of wireline penetration rates as set forth in the above-cited Reports.

In addition to the foregoing reply comments, Golden West wishes to express its support for the positions set forth in the comments of the National Telecommunications Cooperative Association filed in this proceeding.

### **Conclusion**

Golden West recognizes the need for accurate information reflecting the realities of rural telecommunications service so that sound public policy can be formulated to secure the long term viability of the Federal Universal Service Fund and to preserve and extend the availability of universal telecommunications service. Golden West respectfully requests that any order in

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<sup>6</sup> See *In the Matter of Western Wireless Corporation Petition for Designation as an Eligible Telecommunications Carrier for the Pine Ridge Reservation in South Dakota*, FCC 01-284, CC Docket No. 96-45 (Rel. October 5, 2001).

<sup>7</sup> See TC03-191 before the Public Utilities Commission of the State of South Dakota.

this proceeding reflect these realities and the concepts set forth by the National Telecommunications Cooperative Association in their comments.

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